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7 DANIEL BOGDEN
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8 *Of Counsel*

9 IN THE UNITED STATES DISTRICT COURT FOR THE
10 DISTRICT OF NEVADA

11 JONATHAN GOLDSMITH,)
12 an individual,) Case No. 2:15-cv-02431 RFB GWF
13 Plaintiff,)
14 v.) **MOTION TO AMEND SCHEDULING
15 INTERNAL REVENUE SERVICE,) ORDER
16 a United States Government Entity,) [First Request]
17 Defendant.)
18 _____)**

19 Comes now the defendant, the United States of America, pursuant to Local Rule IA 6-1
20 and LR 26-4, to hereby request that the Court modify the scheduling order in this case, and states
the following in support:

21 The Court issued a Scheduling Order in this case on April 8, 2016. In accordance with
22 the Court's order, the following deadlines are currently in effect:

23 Dispositive Motions	September 21, 2016
Pre-trial Order	October 21, 2016

The parties have completed all discovery in this matter. A hearing on the United States Motion to Dismiss is scheduled for September 22, 2016. The United States requests that the dispositive motion date be continued, if necessary, until 30 days after the Court rules on the Motion to Dismiss. This request is not meant for delay but rather to conserve costs and resources.

Specifically, the United States respectfully requests that the Court amend the Scheduling Order as follows:

Dispositive Motions If necessary, due 30 days after the Court rules on the pending Motion to Dismiss

Pre-trial Order If necessary, due 60 days after the Court rules on the pending Motion to Dismiss

In the event dispositive motions are filed, the date for filing the proposed joint pre-trial Order shall be suspended until thirty (30) days after decision of the dispositive motion or further Order of the Court.

CAROLINE D. CIRAOLO
Deputy Principal Assistant Attorney General

/s/ Virginia Cronan Lowe
VIRGINIA CRONAN LOWE
Trial Attorney, Tax Division
U.S. Department of Justice

Of counsel:
DANIEL BOGDEN
United States Attorney

Attorneys for Defendant

Dated: September 13, 2016

IT IS SO ORDERED.

George Foley Jr.
GEORGE FOLEY, JR.
United States Magistrate Judge

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on this 1st day of Setember, 2016, I electronically filed the foregoing

3 **MOTION TO AMEND SCHEDULING ORDER [First Request]** using the CM/ECF system,

4 which will send notification of such filing to the following:

5 Jonathan B. Goldsmith, Esq. at jonathan@vegaslawsite.com

7 */s/ Virginia Cronan Lowe* _____
8 VIRGINIA CRONAN LOWE
9 Trial Attorney, Tax Division
United States Department of Justice